

27 May 2003

Bill Pennington Project Manager Energy Efficiency and Demand Analysis Division California Energy Commission 1516 Ninth Street, MS-28 Sacramento, CA 95814

sent via email: bpenning@energy.state.ca.us

re: Comments on February draft, Title 24 revision, Section 118(e) 2

Dear Mr. Pennington:

Comment

I'm not sure exactly what is intended by this regulation, or how it plays with the definition of "indirectly conditioned space" in Section 101. Perhaps it makes sense if the word "and" in the phrase "installed and the space between the ceiling" is replaced with "if."

More important: To meet various building code requirements, especially wind-uplift requirements, the underside of a loose-laid membrane must be vented to the outside to prevent blowoff unless rock ballast is used. While this is not our line of business, my reading of this regulation is that you are now prohibiting the use of un-ballasted loose-laid single-ply membranes (EPDM, TPO, PVC, CPSE, and related technologies). This is a significant fraction of the roofing market. Was this intended?

If you have any questions, please call me at (323) 908-5279.

Paul A. Beemer Director, Legal & Technical Affairs Henry Company